

OGC 78-1401

7 March 1978

OK 78-0153/1

MEMORANDUM FOR: Office of Legislative Counsel

ATTENTION :

FROM :

Assistant General Counsel

SUBJECT :

Draft OMB Bill and Letter of Transmittal Concerning
Proposed "Commission on Retirement Policy to
Investigate and Evaluate Public and Private Retirement
Programs in the United States, and for Other
Purposes"

1. While I suppose it is none of this Agency's official business, this entire proposal is capricious. To state, as does the transmittal letter, that this Commission "will be neither expensive nor demand a large staff, since so much work has already been done," would seem to imply there is no need for the Commission at all. But then to request \$1 million per year for two years and a staff of 15, with a GS-18 "Executive Director" and the potential for three GS-17 "chiefs" of units, and six GS-16 "research assistants", becomes ludicrous.

2. Substantively, Section 4(c)(2) should be modified by adding at the beginning "Except as otherwise provided by law, the Commission" This would recognize the limitations appropriately imposed by the Privacy Act, the National Security Act, the CIA Act, and the various other statutes which protect various categories of information.

3. The chartmakers at OMB are not in tune with the letter- and bill-drafters. "Chairman" on the proposed organization chart should conform by referring to "Chairperson."

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